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September 1, 2015

**VIA E-MAIL**  
**AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**RE: In re Motors Liquidation Company, *et al.***  
**Case No. 09-50026 (REG)**

**Errata re Docket No. 13411.**

Dear Judge Gerber:

We write on behalf of certain Non-Ignition Switch Plaintiffs represented by Co-Lead and Designated Counsel to notify the Court of an error in the letter filed on August 31, 2015 apprising the Court of the status of the Non-Ignition Switch Plaintiffs' GUC Trust Asset Pleading [ECF 13411]. In that letter, we inadvertently indicated that Phase 2 discovery in the MDL Action is set to commence this Fall, when, in fact, Phase 2 discovery started in June and ends in November and includes some discovery related to Non-Ignition Switch claims. Phase 3 discovery in the MDL Action is expected to commence this Fall with Non-Ignition Switch claims as a key topic.

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Respectfully submitted,

/s/ Steve W. Berman

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